

O'KEEFE & O'KEEFE LLP
Garet D. O'Keefe (SBN 168415)
1341 Francisco Street
Berkeley, CA 94702
Tel.: (510) 540-8320
Fax.: (510) 540-6169

Attorneys for Plaintiff
Susan Kiely Krauss

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SUSAN KIELY KRAUSS, an individual

Plaintiff,

vs.

VOLKSWAGEN OF AMERICA, INC., a
Delaware Corporation,

Defendant.

CASE NO. C04-02989 PJH

**STIPULATION AND ~~[PROPOSED]~~ ORDER
TO CONTINUE CASE MANAGEMENT
CONFERENCE**

1 Plaintiff Susan Kiely Krauss ("Plaintiff") and defendant Volkswagen of America,
2 Inc. ("Defendant"), through their respective counsel, hereby stipulate to continue the Case
3 Management Conference, currently scheduled for February 2, 2006, as follows:
4

5 **STIPULATION**

6 IT IS HEREBY STIPULATED by, between and among Plaintiff, on the one hand, and the
7 Defendant, on the other hand, through their respective attorneys, as follows:

8 WHEREAS a Case Management Conference is currently calendared for February 2,
9 2006;

10 WHEREAS the Parties reached a written settlement that required defendant VWoA to
11 provide settlement checks to plaintiff between January 1, 2006 and January 15, 2006, and that
12 additional time is now needed for VWoA to correct clerical errors in the settlement checks that
13 were provided VWoA and returned by plaintiff Susan Krauss;

14 WHEREAS postponement of the aforementioned conference will allow the Parties
15 time to fully perform their respective obligations under the settlement agreement and then file a
16 Stipulation for Dismissal of this action;

17 WHEREAS good cause exists for the requested order because allowing time for the
18 parties to complete the settlement and dismiss this action will save the parties time, effort, and
19 expense, and will further conserve judicial resources;

20 NOW THEREFORE it is stipulated by and between the Parties, through their
21 respective counsel of record, as follows:

22 The Case Management Conference shall be continued from February 2, 2006, to February
23 23, 2006, or as soon thereafter as is convenient for the Court.
24
25
26
27
28

1 IT IS SO STIPULATED.

2
3 DATED: January 30, 2006

JEFFER, MANGELS, BUTLER & MARMARO LLP
R. SCOTT BRINK
BARBRA A ARNOLD

6 BY: _____/S/
BARBRA ARNOLD
ATTORNEYS FOR DEFENDANT VOLKSWAGEN
OF AMERICA, INC.

9 DATED: January 30, 2006

O'KEEFE & O'KEEFE LLP
GARET D. O'KEEFE

12 BY: _____/S/
GARET D. O'KEEFE
ATTORNEYS FOR PLAINTIFF SUSAN KIELY
KRAUSS

16 **[PROPOSED] ORDER**

17 Good cause having been shown by the foregoing Stipulation of the parties,

18 IT IS HEREBY ORDERED that the Case Management Conference be continued from February 2,
19 February 23
20 2006, to _____, 2006.

22 **IT IS SO ORDERED.**

23 1/31/06

24 Dated: _____



ATTESTATION

I hereby attest that the content of this document is acceptable to all persons required to sign the document, and that I have on file all required holograph signatures for any signatures indicated by a "conformed" signature within this efiled document.

/s/
Garet D. O'Keefe